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7  
8 IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF WASHINGTON  
9 AT SPOKANE

10 UNITED FOOD AND COMMERCIAL  
WORKERS UNION, LOCAL 3000, a  
non-profit corporation, UNITED FOOD  
11 AND COMMERCIAL WORKERS  
UNION, LOCAL 1439, a non-profit  
12 corporation, UNITED FOOD AND  
COMMERCIAL WORKERS UNION,  
13 LOCAL 21, a non-profit corporation,  
AND FAYE IRENE GUENTHER,  
14 an individual,

15 Plaintiffs,

16 v.

17 JOSEPH H. EMMONS, individually,  
AND OSPREY FIELD CONSULTING  
18 LLC, a limited liability company,

19 Defendants.

No. 2:22-cv-00272-TOR

**STIPULATED MOTION TO  
EXPEDITE HEARING  
DATE ON STIPULATED  
MOTION TO EXTEND  
BRIEFING SCHEDULE  
FOR DEFENDANTS' RULE  
12(b)(6) MOTION TO  
DISMISS COMPLAINT**

**2/23/2023  
WITHOUT ORAL  
ARGUMENT**

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23 STIPULATED MOTION TO EXPEDITE HEARING DATE  
ON STIPULATED MOTION TO EXTEND BRIEFING  
SCHEDULE FOR MOTION TO DISMISS  
Case No. 2:22-cv-00272-TOR

1 The parties jointly request the Court enter an order setting an expedited  
2 hearing date of February 23, 2023, on the parties' concurrently filed Stipulated  
3 Motion to Extend Briefing Schedule for Defendants' Rule 12(b)(6) Motion to  
4 Dismiss Complaint. *See* L. Civ. R. 7(i)(2)(C).

5  
6 The parties jointly represent there is good cause to grant their request for an  
7 expedited hearing date. Defendants' Rule 12(b)(6) Motion to Dismiss Complaint is  
8 noted for hearing with oral argument on May 24, 2023. *See* Dkt. 9. The parties wish  
9 to have additional time to thoroughly brief the issues raised by the Motion to Dismiss  
10 and therefore jointly request a three-week extension of each of the current briefing  
11 deadlines. This requested extension would not alter any existing Court deadlines. If  
12 the parties' Stipulated Motion to Extend Briefing Schedule cannot be heard sooner  
13 than February 23, 2023, the parties' requested relief would be moot, as Plaintiffs'  
14 response to the Motion to Dismiss is due March 6, 2023.

15  
16 Accordingly, the Court should enter an order expediting the hearing date to  
17 February 23, 2023, on the Stipulated Motion to Extend Briefing Schedule for  
18 Defendants' Rule 12(b)(6) Motion to Dismiss Complaint.

19 DATED this 16th day of February, 2023.  
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Attorneys for Plaintiffs

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**ORDER**

Pursuant to stipulation, IT IS SO ORDERED.

DATED this \_\_\_\_\_ day of \_\_\_\_\_, 2023.

\_\_\_\_\_  
THOMAS O. RICE  
United States District Judge

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on February 16, 2023, I caused the document to which  
3 this certificate is attached to be electronically filed with the Clerk of the Court  
4 using the CM/ECF system which will send notification of such filing to the  
5 following:

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18 ***Attorneys for Plaintiffs***

19 I declare under penalty of perjury that the foregoing is true and accurate.

20 DATED this 16th day of February, 2023.

21 By: s/ Ambika Kumar

22 Ambika Kumar, WSBA #38237